

DANIEL G. SWANSON, SBN 116556
dswanson@gibsondunn.com
GIBSON, DUNN & CRUTCHER LLP
333 South Grand Avenue
Los Angeles, CA 90071
Telephone: 213.229.7000
Facsimile: 213.229.7520

CYNTHIA E. RICHMAN (D.C. Bar No.
492089; *pro hac vice*)
crichman@gibsondunn.com
GIBSON, DUNN & CRUTCHER LLP
1050 Connecticut Avenue, N.W.
Washington, DC 20036
Telephone: 202.955.8500
Facsimile: 202.467.0539

JULIAN W. KLEINBRODT, SBN 302085
jkleinbrodt@gibsondunn.com
GIBSON, DUNN & CRUTCHER LLP
One Embarcadero Center, Suite 2600
San Francisco, CA 94111
Telephone: 415.393.8200
Facsimile: 415.393.8306

MARK A. PERRY, SBN 212532
mark.perry@weil.com
JOSHUA M. WESNESKI (D.C. Bar No.
1500231; *pro hac vice*)
joshua.wesneski@weil.com
WEIL, GOTSHAL & MANGES LLP
2001 M Street NW, Suite 600
Washington, DC 20036
Telephone: 202.682.7000
Facsimile: 202.857.0940

MORGAN D. MACBRIDE, SBN 301248
morgan.macbride@weil.com
WEIL, GOTSHAL & MANGES LLP
Redwood Shores Pkwy, 4th Floor
Redwood Shores, CA 94065
Telephone: 650.802.3044
Facsimile: 650.802.3100

Attorneys for Defendant APPLE INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

EPIC GAMES, INC.

Plaintiff, Counter-defendant
v.

APPLE INC.,

Defendant, Counterclaimant

Case No. 4:20-cv-05640-YGR-TSH

**EXHIBIT A (REDACTED) TO
DECLARATION OF MARK A. PERRY IN
SUPPORT OF APPLE INC.'S STATEMENT
IN SUPPORT OF ADMINISTRATIVE
MOTION TO SEAL**

The Honorable Thomas S. Hixson

EXHIBIT A

(Redacted)

Production Bates of Parent Document (Folder Title)	Doc Number	Production Bates Beginning	Production Bates End	Custodians	Document Date	Document Time	From	To	Cc	Bcc	Subject	Original Name	Redact or Withhold	Privilege Type	Privilege Description	Additional Privilege Context	Attorneys, Legal Staff, and Employees Acting at the Direction of Counsel	Special Master Determination (Priv - Yes; Priv - No)
Correspondence Involving Only Non-Legal Personnel																		
PRIV-APL-EG_00098216	2652	PRIV-APL-EG_00098215	PRIV-APL-EG_00098230	Savio, Alusa	2022-06-03	00:03:37						Personal messages Alusa Savio and Carolina Nugent - 2022-06-03 (UTC) .pdf	Redact	Attorney/Client	Document with redacted text reflecting legal advice from counsel regarding foreign regulatory issues in the European Union, including DMA.	Non-attorneys discussing questions for Apple legal and outside counsel.	Ling Lew (Apple in-house counsel)	Yes, except page 28218.
PRIV-APL-EG_00156327	832	PRIV-APL-EG_00156327	PRIV-APL-EG_00156334	Ajemian, Peter	2023-12-19	15:39:39	Archelle Thelmaque	Peter Ajemian	Adam Dema		Re: Sync re: JP2B Evaluation	20231219-0739 Re: Sync re: JP2B Evaluation .eml	Redact	Attorney/Client	Email chain reflecting legal advice from counsel regarding injunction compliance requirements for link format and buttons.		Apple App Store in-house counsel	Yes
Emails Primarily Discussing Business-Related Topics																		
PRIV-APL-EG_00157336	961	PRIV-APL-EG_00157336	PRIV-APL-EG_00157350	Bavaro, Sam	2024-05-17	15:48:11	Saema Shambekar	Ling Lew	Sam Muller Bavaro Justin Ruiz Stephanie Jennifer Brown Sean Cameron Joshua Wesneski		Re: Pending StoreKit entitlement requests report	20240517-0848 Re: Pending StoreKit entitlement requests report .eml	Redact	Attorney/Client	Email chain with redacted text providing information for the purpose of rendering legal advice to counsel regarding foreign regulatory issues in Russia.	Email chain in which counsel seeks consistent updates regarding statistics for the App Store link programs in various countries, including United States and Russia, for the purpose of providing related legal advice.	Gibson Dunn (outside counsel); Wei Gotshal and Manges (outside counsel); Jennifer Brown (Apple in-house counsel); Jenny Lee (Apple in-house counsel); Sean Cameron (Apple in-house counsel); Stephanie Fine (Apple in-house counsel)	Yes
PRIV-APL-EG_00259982	11222	PRIV-APL-EG_00259982	PRIV-APL-EG_00259998	Ajemian, Peter; Thai, Ann; Bavaro, Sam	2024-05-17	18:07:37	Ling Lew	Peter Ajemian	Sam Muller Bavaro Stoney Gamble Eric Albert Ann Thai Fred Sano Brendan McNamara Archelle Thelmaque		Re: EU alt marketplace / Apple + Bloomberg	20240517-1107 Re: EU alt marketplace - Apple + Bloomberg .eml	Redact	Attorney/Client	Email chain with redacted text reflecting information for the purpose of obtaining legal advice with counsel regarding foreign regulatory issues in the European Union, including DMA.	Draft press statements sent to legal team for review prior to response and related redactions to third-party edits that are necessary to protect the details of the content responded to by legal team.	Ling Lew (Apple in-house counsel); Brendan McNamara (Apple in-house counsel); Tom McNamara (Apple in-house counsel)	Yes
PRIV-APL-EG_00260161	11244	PRIV-APL-EG_00260161	PRIV-APL-EG_00260163	Kirtane, Lalika; Thai, Ann	2023-11-28	06:19:20	Eric Albert	Ling Lew	Ann Thai Fred Sano Isaac Ruben Lalika Kirtane Raman		Re: DMA Comms Meeting	20231127-2219 Re: DMA Comms Meeting .eml	Redact	Attorney/Client	Email chain reflecting legal advice from counsel regarding injunction compliance requirements for link format and buttons.	Email chain with business team asking for legal team clarification and legal team providing input.	Ling Lew (Apple in-house counsel)	Yes
PRIV-APL-EG_00156271	819	PRIV-APL-EG_00156271	PRIV-APL-EG_00156273	Ajemian, Peter	2024-01-28	11:51:43	Brendan McNamara	Peter Ajemian			Re: Request for today: updated reactive materials	20240128-0352 Re: Request for today: updated reactive materials .eml	Redact	Attorney/Client	Email chain with redacted text providing information for the purpose of obtaining legal advice from counsel regarding foreign regulatory issues press and communications legal strategy.		Brendan McNamara (Apple in-house counsel)	Yes